

# **West Coast Protective League**

**Representing Workers in**  
*Glass, Cast or Molded Metal Products, Pottery, Paper, Plastics & Allied Industries*

October 30, 2003

California Energy Commission  
1516 9th Street  
Sacramento, Ca. 95814

**Re: 2005 Building Energy Efficiency Standards, 45 Day Language**  
**Express Terms**

To whom it may concern,

The West Coast Protective League would like to submit the following comments to the 2005 Building Energy Efficiency Standards.

The latest version of the CEC protocol does not require stabilized cellulose insulation with water to meet any drying standard. We believe this must be addressed because of the negative impact it can have on the R-value of the insulation and the problems that can occur if the material is enclosed in the wall cavity while wet.

The Cellulose Insulation Manufacturers Association Technical bulletin #3 *Standard Practice for the Installation of Sprayed Cellulosic Wall Cavity Insulation* contains the following statement:

**Normal drying will occur within 24 to 48 hours depending upon climate conditions, depth of fill, and initial moisture content. The manufacturer's recommended drying times shall be followed.**

The Federal Trade Commission issued a proposed rule on July 15, 2003, (The Federal Register/Vol. 88, No. 135), which contains the following statement about drying times:

**"Finally, the Commission notes that if there is information, such as drying times, that are important to the proper installation of the materials in question [stabilized cellulose], manufacturers should disclose that information."**

The West Coast Protective League strongly recommends that the CEC address the drying time of cellulose insulation and require inspectors to verify all insulation is dry prior to closing up a wall cavity. This will greatly improve the quality of insulation.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "David A. Hoffman". The signature is written in a cursive style with a large, stylized "D" and "H".

David A. Hoffman

President

West Coast Protective League